

**IN THE UNITED STATES BANKRUPTCY COURT  
District of Puerto Rico**

**In the Matter of:**

JESUS JASIEL JIMENEZ HUERTAS

Debtor(s)

Case No. **13-04969 ESL**

Chapter 13

**OPPOSITION TO DISMISSAL AND MOTION TO INFORM  
TO THE HONORABLE COURT:**

The undersigned, attorney for the above-named debtor, notifies the Court as follows,

1. The trustee filed a motion requesting the dismissal of present case arguing that insurance for vehicle financed by reliable was not provided, neither provisions in the plan on behalf of Banco Popular and Reliable Financial Services.
2. Debtor amended plan dated October 13 to address all those issues and amended Statement of Financial Affairs to report transfer of vehicle to a third party (item 10 in SOFA).

With the amendments debtor understand that his plan is confirmable. Copy of the insurance coverage has been made part of this motion.

**WHEREFORE**, we respectfully request from this Honorable Court to take notice of the informed above and deny motion to dismiss. Debtor also request the confirmation of amended plan dated 10/13/2013.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY**, that on this same date a true and exact copy of the foregoing has been filed with the Clerk of the Court that will be notified to the Chapter 13 Trustee Alejandro OLiveras Rivera and all other appearing parties using the Court's CM/ECF system. Non appearing parties will be notified by U. S. regular mail as per Master Address List attached.

In Vega Baja, Puerto Rico, on this October 13, 2013

s/ Juan O. Calderon Lithgow  
**JUAN O. CALDERON LITHGOW**  
ATTORNEY FOR DEBTOR, 205607  
APARTADO 1710  
VEGA BAJA, PR 00694-1710  
TEL.: 787-858-5476  
Email: [caldlithlaw@gmail.com](mailto:caldlithlaw@gmail.com)

**EASTERN AMERICA INSURANCE COMPANY**

P.O.Box 71517 San Juan, PR 00936-8617

Tel: (787) 774-9211

**Quote ID:**

24720

**PREMIUM CALCULATION**

**Date requested:** 9/5/2013 2:48:02PM  
**By:** eMail  
**Debtor:** JESUS J JIMENEZ HUERTAS  
**Join debtor:**  
**Case #:** 1304969  
**Esq.:** JUAN O CALDERON LITHGOW

**Manufacturer:** SUZUKI  
**Year:** 2006  
**Lienholder:** RELIABLE FINANCIAL SERVICES  
**Balance:** \$20,894.00

**Manufacturer:** XL-7  
**VIN #:** JSETY92V164101201  
**Loan:** 0625  
**File Date:** 06/16/2013  
**Maturity Date:** 04/01/2017

\$44.00 (MONTHLY PREMIUM 12 MONTHS).

**TOTAL ESTIMATED COVERAGE IS:** \$528.00

IRMA LUZ CORTES CUEVAS  
409 CALLE LISA, SAN DEMETRIO  
VEGA BAJA, PR 00693

FIRST BANK  
PO BOX 13817  
SAN JUAN, PR 00908-3817

JUAN O. CALDERON-LITHGOW  
JUAN O. CALDERON-LITHGOW  
P.O. BOX 1710  
VEGA BAJA, P. 00694-1710

MAZA & GREEN  
PO BOX 364028  
SAN JUAN, PR 00936-4028

ACS/COLLEGE LOAN CORP  
14303 GATEWAY PL  
POWAY, CA 92064

R&G MORTGAGE  
PO BOX 362394  
SAN JUAN, PR 00936

AMERICAN STUDENT AST  
100 CAMBRIDGE ST STE 160  
BOSTON, MA 02114

AT&T MOBILITY  
P.O. BOX 15067  
SAN JUAN, PR 00902-8567

BANCO BILBAO  
POB 364745  
SAN JUAN, PR 00936

BANCO BILBAO VIZCAYA  
PO BOX 364745  
SAN JUAN, PR 00936-4745

BANCO POPULAR  
PO BOX 713575  
SAN JUAN, PR 00936-7077

CINGULAR  
PO BOX 192830  
SAN JUAN, PR 00919